WARRANT FOR ARREST

United States District Court			SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA v. PETER KETCHUM, JR. a/k/a "iwearaMAGNUM" WARRANT ISSUED ON THE BASIS OF: □ Order of Court □ Indictment □ Information X Complaint TO: UNITED STATES MARSHAL OR ANY OTHER AUTHORIZED OFFICER			į I	MAGISTRATE'S CASE NO. INDIVIDUAL TO BE ARRESTED PETER KETCHUM, JR. /k/a "iwearaMAGNUM"
YOU ARE HEREBY COMMANDI District Court to answer to the charg			d person and brin	g that person before the United States
DESCRIPTION OF CHARGES				
IN VIOLATION OF		UNITED STATES CODE TITLE 18		SECTION 1029 (b) (2)
BAIL OTHER CONDITIONS O		OTHER CONDITIONS OF R	ELEASE	
ORDERED BY ANDREW J. PECK UNITED STATES: MAGISTRATE JUDGE CLERK OF DURTHERN DISTRICT OF NEW YORK SOUTHERN DISTRICT OF NEW YORK			DGE/U.S. MAGISTRATE	DATE ISSUED
RETURN				
This warrant was received and executed with the arrest of the above-named person.				
DATE RECEIVED	NAME AND TITLE OF ARRESTING		OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED				

Note: The arresting officer is directed to serve the attached copy of the charge on the defendant at the time this warrant is executed.

Approved: SARAH E. MCCALLUM/TIMOTHY T. HOWARD 1651

Assistant United States Attorneys

Before:

HONORABLE ANDREW J. PECK

United States Magistrate Judge Southern District of New York

UNITED STATES OF AMERICA

SEALED COMPLAINT

- v. -

Violation of 18 U.S.C. § 1029(b)(2)

PETER KETCHUM, JR.,

a/k/a "iwearaMAGNUM,"

COUNTY OF OFFENSE:

New York

Defendant.

:

SOUTHERN DISTRICT OF NEW YORK, ss.:

GEORGE J. SCHULTZEL, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE (Conspiracy to Commit Access Device Fraud)

- 1. From in or about June 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit access device fraud in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(a)(5).
- 2. It was a part and an object of the conspiracy that PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant, and others known and unknown, would and did knowingly and with intent to defraud traffic in and use one and more unauthorized access devices during a one-year period, in interstate and foreign commerce, and by such conduct would and did obtain a thing and things of value aggregating \$1,000 and more during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

3. It was a further part and an object of the conspiracy that PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant, and others known and unknown, would and did knowingly and with intent to defraud effect transactions, affecting interstate and foreign commerce, with one and more access devices issued to another person and persons, to receive payment and any other thing of value during a one-year period the aggregate value of which was equal to or greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

Overt Acts

- 4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about July 24, 2011, PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant, arranged with a coconspirator to receive five laptop computers at a "drop" address.
- b. On or about September 17, 2011, another coconspirator sent an electronic message to KETCHUM confirming payment made to KETCHUM reimbursing the latter for shipping costs associated with a "drop."

(Title 18, United States Code, Section 1029(b)(2).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

- 5. I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with other law enforcement agents, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.
- 6. I have been a Special Agent with the FBI for approximately two years. For the past year, I have been assigned to the computer intrusion squad in the FBI's New York

Field Office. I have received training regarding computer technology, computer fraud, and white collar crimes.

Background on the UC Site

- 7. Based on my training and experience, I have learned the following:
- Carding: "Carding" refers to various criminal activities associated with stealing personal identification information and financial information belonging to other individuals - including the account information associated with credit cards, bank cards, debit cards, or other access devices and using that information to obtain money, goods, or services without the victims' authorization or consent. For example, a criminal might gain unauthorized access to (or "hack") a database maintained on a computer server and steal credit card numbers and other personal information stored in that database. The criminal can then use the stolen information to, among other things: (1) buy goods or services online; (2) manufacture counterfeit credit cards by encoding them with the stolen account information; (3) manufacture false identification documents (which can be used in turn to facilitate fraudulent purchases); or (4) sell the stolen information to others who intend to use it for criminal purposes. "Carding" refers to the foregoing criminal activity generally and encompasses a variety of federal offenses, including, but not limited to, identification document fraud, aggravated identity theft, access device fraud, computer hacking, wire fraud, and bank fraud.
- Carding Forums: "Carding forums" are websites used by criminals engaged in carding ("carders") to facilitate their criminal activity. Carders use carding forums to, among other things: (1) exchange information related to carding, such as information concerning hacking methods or computer-security vulnerabilities that could be used to obtain personal identification information; and (2) buy and sell goods and services related to carding, for example, stolen credit card or debit card account numbers, hardware for creating counterfeit credit cards or debit cards, or goods bought with compromised credit card and debit card accounts. Carding forums often permit users to post public messages (postings that can be viewed by all users of the site), sometimes referred to as "threads." For example, a user who has stolen credit card numbers may post a public "thread" offering to sell the numbers. Carding forums also often permit users to communicate one-to-one through so-called "private messages." Because carding forums are, in essence, marketplaces for illegal activities, access is

typically restricted to avoid law enforcement surveillance. Typically, a prospective user seeking to join a carding forum can only do so if other, already established users "vouch" for the prospective user, or if the prospective user pays a sum of money to the operators of the carding forum. User accounts are typically identified by a username and access is restricted by password. Users of carding forums typically identify themselves on such forums using aliases or online nicknames ("nics").

- 8. Based on my participation in the investigation of this matter, I know the following:
- a. In or about June 2010, the FBI established an undercover carding forum (the "UC Site"), enabling users to discuss various topics related to carding and to communicate offers to buy, sell, and exchange goods and services related to carding, among other things.
- b. The FBI established the UC Site as an online meeting place where the FBI could locate cybercriminals, investigate and identify them, and disrupt their activities. 1 The UC Site was configured to allow the FBI to monitor and to record the discussion threads posted to the site, as well as private messages sent through the site between registered users. The UC Site also allowed the FBI to record the Internet protocol ("IP") addresses of users' computers when they accessed the site. 2
- c. Access to the UC Site was limited to registered members and required a username and password to gain entry. Various membership requirements were imposed from time to time to restrict site membership to individuals with established knowledge of carding techniques or interest in criminal activity. For example, at times new users were prevented from joining the site unless they were recommended by two existing users who had registered with the site, or unless they paid a registration fee.
- d. New users registering with the UC Site were required to provide a valid e-mail address as part of the

The registration process for the UC Site required users to agree to terms and conditions, including that their activities on the UC Site were subject to monitoring for any purpose.

Every computer on the Internet is identified by a unique number called an Internet protocol ("IP") address, which is used to route information properly between computers.

registration process. An e-mail message was sent to that email address containing registration instructions. In order to complete the registration process, the new user was required to open the e-mail, click on a link in it, and then enter an activation code specified in the e-mail message. The e-mail addresses entered by registered members of the site were collected by the FBI.

- e. In the course of the undercover operation, the FBI contacted multiple affected institutions and/or individuals to advise them of discovered breaches in order to enable them to take appropriate responsive and protective measures. Based on information obtained through the site, the FBI estimates that it helped financial institutions prevent many millions of dollars in losses from credit card fraud and other criminal activity, and has alerted specific individuals regarding breaches of their personal email or other accounts.
- f. At all times relevant to this Complaint, the server for the UC Site, through which all public and private messages on the UC Site were transmitted, was located in New York, New York.

Background on "Drop" Addresses

- 9. Based on my training and experience investigating carding crimes, I know that individuals who use stolen credit card information to purchase goods on the Internet are typically reluctant to ship the goods to their own home addresses, for fear that law enforcement could easily trace the purchases. Accordingly, carders often seek out addresses with which they have no association, such as vacant houses or apartments, where carded goods can be shipped and retrieved without leaving evidence of their involvement in the shipment. Carders commonly refer to such addresses as "drops."
- 10. Based on my training and experience investigating carding crimes, I also know that it is common for members of carding forums to make drops available to other forum members, usually in exchange for some form of compensation. One frequently used form of compensation is a "1-to-1" arrangement, in which the carder wishing to ship to the drop must ship two of whatever items he has carded one for the provider of the drop to forward to the carder, and the other for the provider of the drop to keep as payment in kind for the carder's use of the drop. Another frequently used compensation arrangement is for the carder and the drop provider to agree to resell the carded

items shipped to the drop and to split the proceeds between them.

Drop Service Offered by "iwearaMAGNUM"

- 11. On or about June 21, 2011, an individual registered with the UC Site under the nickname "iwearaMAGNUM." "iwearaMAGNUM" provided his e-mail address as "peterk0806@yahoo.com" for the purpose of receiving registration instructions. As detailed below, this individual has been identified as PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant. The investigation has further revealed that KETCHUM sold "drop" services to carders, to facilitate the delivery of electronics and other items fraudulently obtained with stolen credit card information.
- 12. On or about June 21, 2011, the same day he registered for the UC Site, "iwearaMAGNUM" posted a message on the UC Site in which he introduced himself to other site users, stating, "My name is Peter and I'm 20 years old, about to be 21. I have done some ratting, and I have recently, at work, been taking pictures of people's information on applications, (they give their full info, SS number) and used them to set up Paypals, and Ebays to scam people on Ebay." Based on my training and experience, I know that "ratting" refers to the use of "remote access tools" malware, or "RATS," that allow their users to control, remotely, the operations of an infected computer. "iwearaMAGNUM" continued his introductory posting by stating, among other things, that he "came here to buy and sell Ebay accounts."
- 13. I have reviewed all of the public threads posted and private messages sent by "iwearaMAGNUM" on the UC Site following his registration to the site on or about June 21, 2011 and his introductory posting of that date. In at least two private messages, "iwearaMAGNUM" received from other UC Site members Ebay and PayPal account information.
- 14. Also on or about June 21, 2011, "iwearaMAGNUM" began sending private messages to other UC Site users soliciting their help in establishing him as a drop service supplier. Specifically, "iwearaMAGNUM" sent messages asking others whether they needed drop services, and asking them whether they would be willing to card items and send them to his drop address to "prove I have a legit drop and [to] give[] me a good vouch from a respected member."
- 15. On or about July 13, 2011, "iwearaMAGNUM" advertised his drop services more publicly, posting a thread entitled

"*Drop Service*." In the thread, "iwearaMAGNUM" stated: "I made this thread looking for someone who might be looking for a person with multiple drops . . . The person must be a serious carder, carding often, and consistently." This thread (which, as discussed below, was later updated) further advertised that "iwearaMAGNUM"'s drops were "located in the USA, MASS, spread across multiple cities," and that his price for service would consist of a duplicate of the item shipped: "You will ship two items, one for me and one for you." In private messages elaborating upon his drop service, "iwearaMAGNUM" explained, "I rotate my drops for maximum safety and usage . . . I have a few, at the moment," and "I'm just looking for someone who will consistently card and use my drop."

16. Based on my review of the public threads posted and private messages sent by "iwearaMAGNUM" and others on the UC Site, I know that several UC Site members accepted "iwearaMAGNUM"'s offer to supply drop services in exchange for carded items and/or cash.

"iwearaMAGNUM"'s Transaction with CC-1

- 17. One UC Site member ("CC-1") arranged in or about July 2011 to have five Dell laptop computers, obtained with stolen credit card information, delivered to one of "iwearaMAGNUM"'s drop addresses.
- 18. "iwearaMAGNUM" referenced this transaction in an update to his "*Drop Service*" thread, posted on or about July 27, 2011. Specifically, "iwearaMAGNUM" stated that he "did business with [CC-1] recently," and referred readers to one of CC-1's own threads. That thread, which was likewise dated July 27, 2011, was entitled "Dell Laptops and Computers! Vouches and Proof!," and was subtitled "Dell Carding Service!" In the thread, CC-1 confirmed that "iwearaMAGNUM" had received five Dell laptops on CC-1's behalf and included a link to a photograph of a FedEx shipping label from Dell bearing the address "49 Delaware Road, Pittsfield, MA."
- 19. Based on my review of the private messages sent between "iwearaMAGNUM" and CC-1 on the UC Site, I know the following:
- a. In a private message dated on or about July 24, 2011, CC-1 directed "iwearaMAGNUM" to contact him on "msn," which, based on my training and experience, I know to mean MSN Messenger, a form of electronic instant message communication.

- b. Later the same day, CC-1 instructed "iwearaMAGNUM" to send him currency through an online currency provider, and "iwearaMAGNUM" then confirmed that he had sent CC-1 "\$150.00 that you can keep."
- Two days later, on or about July 26, 2011, CC-1 c. sent "iwearaMAGNUM" a private message saying "I seen you have signed for both packages don't let me down now. Come online asap." I understand, from my review of other private messages between CC-1 and "iwearaMAGNUM," that CC-1 was here instructing "iwearaMAGNUM" to go onto MSN Messenger and communicate with CC-1 there. Fourteen minutes later, CC-1 sent "iwearaMAGNUM" another private message on the UC Site stating "I don't believe you have posted my shit have you." A few minutes after that, "iwearaMAGNUM" responded, "Dude . . . cost me 271 to send ur shit " CC-1 replied by asking for "pics and also TRACKIN NOW." Based on my experience and my review of other messages between CC-1 and "iwearaMAGNUM," I believe that CC-1 was here requesting that "iwearaMAGNUM" send him photographs of the shipping receipt that "iwearaMAGNUM" had received for shipping items on CC-1's behalf, and was also requesting tracking information for the packages.
- 20. As noted, on or about July 27, 2011, the day after the last of the private messages described in the foregoing paragraphs, CC-1 stated in his "Dell Laptops and Computers! Vouches and Proof!" thread that "iwearaMAGNUM" had received Dell laptops on CC-1's behalf. CC-1, in advertising CC-1's own ability to card Dell merchandise for a price ("40% of any item"), used his transaction with "iwearaMAGNUM" as proof that CC-1 had successfully carded Dell items. CC-1 stated: "I have a service for anything from dell, must be next day shipping available for the item you desire. Not anything else as I cannot be assed with the chargebacks." CC-1 also stated: "I have success with dell, iWearAMagnum has received 5 laptops from me. And has sent to me now."
- 21. On or about July 28, 2011, CC-1 further discussed the drop transaction he had completed with "iwearaMAGNUM" by posting a message to "iwearaMAGNUM"'s "*Drop Service*" thread. The message stated: "Vouch from me dropped 5 laptops and sent 4 to me no problems and on time great man and partner."
- 22. In a private message "iwearaMAGNUM" had sent to another user of the UC Site on or about June 30, 2011,

"iwearaMAGNUM" stated that one of his drop addresses was "49 Delaware Ave, Pittsfield, Massachusetts, 01247."

- 23. In another private message "iwearaMAGNUM" had sent to yet another user of the UC Site on or about July 8, 2011, "iwearaMAGNUM" stated that one of his drop addresses was "60 D Maple Street, Adams, Massachusetts, 01220."
- 24. As part of my investigation, I have spoken with a representative from Dell and have reviewed records supplied by Dell. I have also reviewed e-mail messages sent to CC-1. Based on my review, I have learned, among other things, the following:
- a. On or about July 23, 2011, Dell received an order for three laptop computers and three accompanying power cord customization kits. Payment for these items was made with an American Express credit card held by an individual living in Grand Rapids, Michigan ("CREDIT CARD 1"), in the amount of \$2,334.24. The person who placed the order requested shipment to "49 Delaware Ave., Pittsfield Massachusetts."
- b. On or about July 24, 2011, Dell received another order, this time for two laptop computers. Payment for these items was made with a Discover credit card ("CREDIT CARD 2"), in two amounts of \$1,167.12 each. The person who placed the order requested shipment to "60 Maple St. Apt. D, Adams, Massachusetts, 01220."
- c. On or about July 26, 2011, CC-1 received by email two photographs sent from a cellular telephone. The photographs both depicted a receipt from the Pittsfield, Massachusetts United States Post Office for a shipment of four items from Pittsfield to the United Kingdom on or about July 26, 2011. The receipt reflects a payment of \$276.15 for shipping.
- 25. I have reviewed documents maintained by American Express. From that review, I have learned that CREDIT CARD 1 is a genuine card issued to an individual who is neither CC-1 nor PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant. I have also learned that \$2,334.24 in charges for Dell merchandise were placed on CREDIT CARD 1 on or about July 23, 2011, and were later reported as fraudulent by the holder of the card.
- 26. I have reviewed documents maintained by Discover. From that review, I have learned that CREDIT CARD 2 is a genuine card issued to an individual who is neither CC-1 nor PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant. I have also

learned that two charges of \$1,167.12 each for Dell merchandise were placed on CRDIT CARD 2 on or about July 24, 2011, and were later reported as fraudulent by the holder of the card.

27. Based on the foregoing, I believe that CC-1 purchased five Dell laptops with two stolen credit card numbers, caused the laptops to be delivered to two drop addresses supplied by "iwearaMAGNUM," and paid "iwearaMAGNUM" for the drop service with one Dell laptop, minus the cost of shipping and \$150.00 (which were to be paid, and were in fact paid, by "iwearaMAGNUM"). In addition, I believe that "iwearaMAGNUM" then shipped the remaining four computers, at a cost of \$276.15, to CC-1 in the United Kingdom.

"iwearaMAGNUM"'s Dealings with CC-2

- 28. Another UC Site member ("CC-2") used "iwearaMAGNUM"'s drop service in or about the summer and fall of 2011. I have reviewed the private messages between "iwearaMAGNUM" and CC-2 on the UC Site, and have learned the following from that review:
- a. On or about June 30, 2011, "iwearaMAGNUM" sent a private message to CC-2 asking him whether he was "looking for a US, drop." CC-2 responded, "Yessir, how many do you have"?
- b. A few days later, on or about July 7, 2011, CC-2 contacted "iwearaMAGNUM" with questions about carding and a proposal for a carding partnership. "iwearaMAGNUM" responded positively, and CC-2 replied, "Alright well add me on msn . . . [and] we can discuss a lil business."
- c. A week later, on or about July 14, 2011, CC-2 wrote to "iwearaMAGNUM" that he had "recently began doing some hardcore carding," and needed a drop. CC-2 further stated that he "would be willing to card you stuff . . . [i]n exchange for you services." He then asked "iwearaMAGNUM" how many drops he had. "iwearaMAGNUM" responded, in substance, that he was amenable to acting as a drop, and that he had "about 6 drops, 3 of which are my main ones." CC-2 relayed his MSN Messenger address to "iwearaMAGNUM," and said he hoped to do business.
- d. About a month later, on or about August 10, 2011, CC-2 reached out to "iwearaMAGNUM" once more, stating that he would "be carding sunglasses/gps/airpurifiers/k2 fake weed(LOTS of this)," and that he "live[s] in the US [s]o shipping wont be a problem." CC-2 further stated that he had "been trying to card legal bud by the p[o] unds so I could flip it in my town,

because people are retards." "iwearaMAGNUM" instructed CC-2 to "get on MSN or ICQ please, need to discuss the drop." Based on my training and experience, I know that (1) "ICQ" here refers to ICQ Messenger, an instant message communication service similar to MSN Messenger; (2) "bud" is slang for marijuana; and (3) "k2" is a form of synthetic marijuana.

- e. From on or about August 15 through on or about August 22, 2011, CC-2 and "iwearaMAGNUM" spoke over the UC Site about CC-2's repeated failed efforts to send k2 to the drop in "Massachusetts."
- On or about September 7, 2011, "iwearaMAGNUM" f. wrote a message to CC-2 asking the latter, "Do you need my drops again?" CC-2 responded that he did, and later stated that he had "shipments coming" of "65 Bags" and "100 Bags" to two separate addresses in Pittsfield, Massachusetts. Based on my review of the private message described above, I believe the "Bags" were bags of synthetic marijuana, and that CC-2 was reporting that he had sent them to drop addresses supplied by "iwearaMAGNUM." CC-2 further stated, "It is INSANELY important that you get these shipments. They will be there the tomarrow 9/8/2011 PLEASE get both of them!" In the same series of messages or "chats," "iwearaMAGNUM" chided CC-2 for ignoring him "on msn" - that is, MSN Messenger. Based on this, I believe that CC-2 and "iwearaMAGNUM" were discussing the remainder of the details about these drops over MSN Messenger.
- g. On or about September 8, 2011, CC-2 sent a private message over the UC Site to tell "iwearaMAGNUM" which of "iwearaMAGNUM"'s drop addresses, in Adams, Massachusetts, and North Adams, Massachusetts, respectively, CC-2 had used to send two more packages.
- h. On or about September 9, 2011, "iwearaMAGNUM" sent a message to CC-2 saying that he "got two outa 4" of the shipments that had been sent, but that one of the four had a mistake in the address, and another had been sent to a "dead" drop. CC-2 responded that he would order "4-6 more packages of this stuff next week," and asked that "iwearaMAGNUM" send the packages that were successfully dropped on to an address in Nebraska. Finally, CC-2 acknowledged that he owed "iwearaMAGNUM" "\$165 from those packages."
- i. On or about September 11, 2011, "iwearaMAGNUM" noted that he was short of money and needed CC-2 to pay the shipping fees upfront before the packages could be forwarded on.

CC-2 asked "iwearaMAGNUM" to "message me your WU info." Based on my training and my experience with this investigation, I know that "WU" refers to "Western Union," a popular money transfer service.

- j. The next day, on or about September 12, 2011, CC-2 sent a message to "iwearaMAGNUM" informing him that the latter would be receiving a "BIG package" at one of his drop addresses in Pittsfield, Massachusetts. CC-2 told "iwearaMAGNUM" that "[t]his is one of the most important packages youll ever get from me . . . It's a bunch of jewelry I direly need!" In subsequent messages the same day, CC-2 supplied "iwearaMAGNUM" with a United Parcel Service tracking number for the package, stated that the "value is just under \$1000.00," and offered to give "iwearaMAGNUM" "\$125 for it+Shipping which is 12.5%."
- k. On or about September 17, 2011, after "iwearaMAGNUM" had received the "BIG package" referenced earlier, CC-2 sent "iwearaMAGNUM" a message saying he would pay "\$160+Shipping on jewelry." The same day, CC-2 sent a message confirming that he had sent \$160 "To Peter Ketchum, North Adams, MA" by Western Union, and gave the confirmation number for that transaction. Finally, CC-2 instructed "iwearaMAGNUM": "Now you have money, so ship that jewelry stuff out and then take a picture of the recipt and send it to me so I know how much to send you for shipping on that. Thanks bud."
- 29. As part of my investigation I have reviewed Western Union payment records for September 19, 2011, and have learned that, on or about that date, a person going by a name believed to be CC-2's true name wired \$160.00 to "Peter Ketchum."
- 30. Based on my training and experience, and on the foregoing, I believe that (1) CC-2 used stolen credit card information to purchase several items, including synthetic marijuana and jewelry; (2) CC-2 had those items shipped to various drop addresses, supplied to him by "iwearaMAGNUM" over MSN Messenger, from which "iwearaMAGNUM" could retrieve the packages; (3) "iwearaMAGNUM" shipped the packages on to addresses supplied to him by CC-2 over the UC Site private messages and over MSN Messenger and/or ICQ; and (4) CC-2 paid "iwearaMAGNUM" through Western Union for his drop services.

Identification of PETER KETCHUM, JR. a/k/a "iwearaMAGNUM"

31. As noted above, when "iwearaMAGNUM" registered with the UC Site, he provided his e-mail address as

"peterk0806@yahoo.com." A subpoena to Yahoo yielded subscriber information showing that the account associated with this e-mail address belongs to "Mr peter ketchum" located in "North Adams, MA," and with a specific date of birth (the "KETCHUM DOB").

- 32. A search warrant executed on the e-mail account peterk0806@yahoo.com has revealed correspondence in which the user, identifying himself as "Peter Ketchum, Jr.," forwards scanned copies of his driver's license and Social Security card (among other documents) as proof of his identity. The driver's license for "Peter S Ketchum Jr." identifies his address as one in North Adams, Massachusetts, and his birth date as the KETCHUM DOB.
- 33. This information is consistent with the information "iwearaMAGNUM" supplied to other UC Site members in his introductory post dated on or about June 21, 2011, which is discussed in paragraph 12 above. In that post, created less than a month before "Peter S Ketchum Jr."'s birthday, "iwearaMAGNUM" stated that his name was "Peter," he was "about to be 21," and he had drop addresses in "USA, MASS."
- 34. Accordingly, I believe that the individual described above as "iwearaMAGNUM" is PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant.

WHEREFORE, I respectfully request that an arrest warrant be issued for PETER KETCHUM, JR., a/k/a "iwearaMAGNUM," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

GEORGE J. SCHULTZEL

Special Agent

Federal Bureau of Investigation

Sworn to before me this 20^{th} day of June 2012

ANDREW J. PECK

UNITED STATES MAGISTRATE JUDGE SOUTHERN DISTRICT OF NEW YORK